

Clerk  
District Court

JAN 16 2007

JAY H. SORENSEN  
c/o Shanghai  
P.O. Box 9022  
Warren, MI 48090-9022  
Telephone: 86 21-5083-8542  
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For The Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

*Attorney Appearing in Pro Se*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS**

ROBERT D. BRADSHAW,

Plaintiff,

v.

COMMONWEALTH OF THE NORTHERN  
MARIANA ISLANDS, et al.,

Defendants.

Civil Action No. 05-0027

**EX PARTE APPLICATION  
UNDER LOCAL RULE 7.1 TO  
INCREASE TIME FOR BRIEFING  
RE PLAINTIFF'S MOTION  
FOR PARTIAL SUMMARY  
JUDGMENT; CERTIFICATE  
MADE PURSUANT TO RULE  
7.1.h.3(b); DECLARATION  
IN SUPPORT**

**CERTIFICATE PURSUANT TO LOCAL RULE 7.1.h.3(b)**

I, JAY H. SORENSEN, certify as follows:

A. The address and phone number of the plaintiff, who is without counsel, is: P.O. Box 473,  
1530 Trout Creek Road, Calder, Idaho 83808. Phone: 208-245-1691, no fax.

The address of the Mark B. Hanson, attorney for Robert A. Bisson, is: 2<sup>nd</sup> Floor, Macaranas  
Bldg., Beach Road, Garapan, PMB 738, Box 10.000, Saipan, MP 96950. Phone: 670-233-8600; Fax:  
670-233-5262.

1 The address of the Attorney General , who represents all the other defendants who have not  
2 been dismissed is: Office of the Attorney General—Civil Division, 2<sup>nd</sup> Floor, Hon. Juan A. Sablan  
3 Memorial Bldg., Caller Box 10007, Saipan, MP 96950. Phone: 670-664 2341;

4 My address and phone are set forth above the caption. .


5 B. The reason this application is ex parte is due to the fact that there is insufficient time to do  
6 a noticed motion or a written stipulation because written communication with the plaintiff and other  
7 parties would take weeks and my response to plaintiff's amended complaint is due on January 18,  
8 2007. Further, good cause exists to grant the motion, as set forth in the application below.

9 C. Pursuant to L.R. 7.1.h.B(1) I called plaintiff to notify him of my intention to file this  
10 application on January 14, 2007, which was the evening of January 13, 2005 in Idaho, where he  
11 lives. I explained what this application was asking the court to do. He told me that he had no  
12 objection. I have also advised counsel for the other defendants by email. I will similarly advise  
13 the clerk's office of this court and notify them of what I am doing.

14 D. There has been no previous request for extensions or increases of time as to these  
15 motions.

16 E. Because the hearing has been set for March 15, 2007, this additional time will have no  
17 delaying effect on hearing or determination of the motion.

18 Certified this 16<sup>th</sup> day of January, 2007.

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22 Jay M. Sorensen  
23 In Pro Se  
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## 1 APPLICATION

2 Defendant, JAY H. SORESENSEN, moves the court pursuant to Local Rule 7.1.h to extend the  
3 time for filing his opposition to plaintiff's motion for partial summary judgment by three weeks,  
4 from January 18 to February 8, 2007. Good cause exists to grant the motion, as set forth in the  
5 declaration below.

6  
7 DECLARATION OF JAY H. SORESENSEN

8 I, JAY H. SORESENSEN, do hereby declare:


9 1. I am a defendant in the above entitled case and submit this declaration in support of this  
10 motion to increase the time for filing and service of the opposition to the partial summary judgment  
11 motion set be heard on March 15, 2007. The facts stated herein are of my own knowledge.

12 2. The motion appears to be long and complicated. It includes 25 pages of argument and  
13 some 36 exhibits. It will require more than the normal amount of time to respond to. Because the  
14 hearing is not scheduled until March 15, 2007, there is are an additional eight weeks beyond the four  
15 weeks that are prescribed in LR 7.1.c.

16 3. I have been unable to find any English language law library in Shanghai. Any legal  
17 research I do must be by utilizing on-line resources. However, since an earthquake that occurred on  
18 December 26, 2006, off the coast of Taiwan, internet connections between China and US based  
19 websites have been severely interrupted, to the point that many sites are simply not accessible at all,  
20 and others take very long periods of time to access. Doing legal research on line from China was  
21 challenging before, due to the slow download times, but now it is often impossible, depending on the  
22 time of day and competition for the available bandwidth. As the attached article from the on-line  
23 version of the January 9 edition of the Shanghai Daily (a China based website that has not been  
24 affected), this problem appears to be one that will not be remedied until the end of January at best.

1 4. Accordingly, the undersigned defendant and moving party here requests that the time  
2 allowed by Local Rule 7.1 for filing and serving the opposition to plaintiff's motion for partial  
3 summary judgment scheduled to be heard on March 15, 2007 be increased by three weeks, making  
4 the opposition papers due on February 8, 2005, which is still five full weeks before the hearing.

5  
6 I declare under penalty of perjury under the laws of the United States of America that the  
7 foregoing is true and correct. Executed this 16<sup>th</sup> day of January, 2007 at Shanghai, P.R. China.

8  
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10   
11 Jay H. Sorensen

**Undersea cable mess won't end too soon**

By Zhu Shenshen 2007-1-9

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SHANGHAI'S Internet users will suffer slow connections until at least the end of the month, telecommunications officials said yesterday.

Crews sent to repair undersea communications cables cut by the December 26 earthquake off Taiwan found the damage to be greater than expected, and bad weather also extended the work schedule.

China Telecom said yesterday the repair will take "a longer period" than anticipated but that 70 percent of its Internet services had been restored through alternate routes.

"Repairs to a single spot will take two to three weeks, but the bad weather will add to the schedule," said an official with an undersea cable management subsidiary of China Telecom.

The source said the repairs are being handled by firms from Japan and Singapore.

The job will be finished by January 30, Taiwan-based Chunghwa Telecom said.

Overseas Internet access, especially between China and the United States, is now being shunted through other pathways such as satellite links, which are slow, expensive and unstable compared with cable-based connections.

The carriers are investing in backup systems to prevent similar telecommunications breakdowns in the future.

Six carriers, including China Telecom, China Netcom and Chunghwa Telecom, will start to build a new undersea cable linking China and the United States at a cost of US\$500 million. The 18,000 kilometer-cable is expected to be completed in the third quarter next year.



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on JAN. 16, 2007

a copy of each of the following:

EX PARTE APPLICATION UNDER LOCAL RULE 7.1 TO INCREASE TIME FOR BRIEFING  
RE PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT; CERTIFICATE  
MADE PURSUANT TO RULE 7.1.h.3(b); DECLARATION IN SUPPORT

were deposited for delivery to the U.S. Post Office, first class mail, postage prepaid, addressed as set  
forth below (except as noted below):

Robert D. Bradshaw  
P.O. Box 473  
1530 W. Trout Creek Road  
Caldcr, Idaho 83808

\* Office of the Attorney General – Civil Division  
Commonwealth of the Northern Mariana Islands  
2<sup>nd</sup> Floor, Hon. Juan A. Sahlan Bldg  
Caller Box 10007  
Saipan, MP 96950

\* Mark B. Hanson  
First Floor, Macaranas Bldg.  
Beach Road, Garapan  
PMB 738, P.O. Box 10,000  
Saipan, MP 96950

  
Jay H. Sorensen

\* Served electronically by agreement of the parties